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COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA TURNPIKE COMMISSION
HARRISBURG 17105

JOHN L. SOKOL, JR., P.E.
EXECUTIVE DIRECTOR

February 25, 1993

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Mr. Ralph Haller
Chief, Private Radio Bureau
Federal Communications Commission
Washington, D. C. 20554

Re: PR Docket Number 92-235 (Part 88)

Dear Mr. Haller:

The Pennsylvania Turnpike is a public highway entity operating in the private land mobile radio (PLMR) spectrum band. As part of this operation, the Pennsylvania Turnpike Commission currently owns and operates its VHF system in the 150 - 174 MHz band. In conjunction with our VHF system, the Pennsylvania Turnpike Commission also owns and operates various UHF repeating systems in the 450 - 470 MHz band, and an extensive call box system in the 72 - 76 MHz band. These systems are used to support the fire, ambulance, police, automotive, and maintenance services for the 491 miles of the Pennsylvania Turnpike. Therefore, it is with deep concern that the Pennsylvania Turnpike Commission must comment on PR Docket Number 92-235 (further referred to as Part 88).

The Pennsylvania Turnpike Commission agrees there is a need for the more efficient use of the PLMR spectrum. The Federal Communications Commission (FCC) has taken the first step, Part 88, in striding towards this goal. The implementation of new, more spectrum efficient technology is a must if the industry is to keep up with current and future communication demands. While this new technology could benefit all who use PLMR, there are some concerns that need to be noted.

First, the allocation of every third channel for Special Mobile Radio (SMR) use in the public safety band is unacceptable. Why should public safety entities go through the effort and the cost of complying to Part 88 when approximately one third of the gained channel availability will be given to SMR usage? The FCC must ensure that public safety keeps its current bandwidth and be allowed to use all the channels that will be created under Part 88. The FCC should allow for public safety expansion well into the twenty-first century. If public safety must bear the cost of complying to Part 88, then public safety should be allowed the full benefit gained by Part 88.

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Second, Part 88 as it is now written, is requiring the use of technology that is not yet available to the public. Additionally, this technology is expected to be in use by a specific date. These requirements raise the following questions: When will this technology be available? Will the technology be available in time to allow migration or wholesale replacement? Who will be able to manufacture it? Will the technology be made available to multiple manufacturers? How much will it cost? The FCC should take the steps necessary to ensure that a timely, broad-based market be established and cost monitored. A reasonable migration time should be established based upon when the technology is available, not by arbitrarily establishing a deadline date. Consideration for funding to cover the cost of migration should also be factored into the deadline date.

Third, radio call boxes are all but ignored in Part 88. Under current Part 90 and the proposed Part 88 (88.1263), call box output power is restricted to 1 watt. Yet, adjacent channel paging services are allowed to operate control links at powers in the 250 - 300 watt ERP range. The FCC must recognize the importance of call box usage. These boxes carry information essential to life and loss of property and should be protected accordingly! Stricter output power limitations on paging control links is a must. The use of directional antenna should be a requirement. Frequency coordination through the American Association of State Highway and Transportation Officials should also be required. Agencies using call boxes must be protected from these high-powered services.

Public safety cannot be compromised. It is the duty of both the Federal Communication Commission and the Pennsylvania Turnpike Commission to provide the general public with the best safety services possible. If Part 88 does not consider SMR exclusion from the public safety band, along with cost, time, and protection for radio call box operation, it will become almost impossible for the Pennsylvania Turnpike to continue to provide our patrons and employees with the best fire, ambulance, police, automotive and maintenance services available. Help the Pennsylvania Turnpike Commission better serve our patrons and employees by considering the above mentioned suggestions and encompassing them into Part 88.

Sincerely,



John L. Sokol, Jr., P.E.
EXECUTIVE DIRECTOR